

As background, I hold an Amateur Radio Extra Class license and have been involved in Amateur Radio emergency communication efforts since 1975. My actual experience includes supporting Disaster Relief operations for such emergencies such as the New York City blackouts of 1977 and 2003, being on scene with the American Red Cross for Hurricane Andrew in 1992, and coordinating relief for the attacks on the World Trade Center in 2001. I have completed levels I, II, and III of the Amateur Radio Emergency Communications Certification Course, am a certified Disaster Communications Technician with the American Red Cross, and currently serve as the Section Emergency Coordinator for the Southern New Jersey Section of the American Radio Relay League.

For the most part, I am in favor of the proposals made by the commission regarding Emergency Communications in the Amateur Radio Service. Allowing RACES operations on any frequency authorized to the Amateur Radio service has been long overdue. Having the Amateur Service frequency use reviewed by OTSP in accordance with the FCC part 214 rules for other services and frequencies during a wartime emergency makes much sense.

As you propose, any amateur radio operator should not be restricted in his or her ability to immediately respond to any emergency. However, experience shows that once a communication emergency progresses from the initial notification phase to the formal response and recovery phases, disaster relief agencies such as the Federal Emergency Management Agency, state and local Offices of Emergency Management, the American Red Cross, the Salvation Army, etc. need and desire an organized response using Amateur Radio operators that have been previously formally trained in disaster relief operations and emergency communications procedures. Well-meaning Amateur radio operators without such formal training in disaster relief activities, formal message handling and safety procedures necessary can sometimes be detrimental to such relief efforts.

Such Amateur Radio emergency communication services are normally provided by trained Amateur Radio Operators affiliated with formal emergency communication organizations and services such as RACES, the Amateur Radio Emergency Service (ARES), the Salvation Army Amateur Radio Emergency Network (SATERN), REACT, the NWS Skywarn program, NHC Hurricane Nets, etc. Such operations and nets have in the past been protected by FCC declarations of Communications Emergencies under section 97.401(c) The proposal to eliminate section 97.401(c) thus should be reconsidered.

If the FCC does not wish to get involved with specific part 97.401(c) emergency communications declarations in the future, then Part 97 should have the following wording added:

"Organized Amateur Radio emergency communications activities (such as, but not limited to, formal emergency communications organizations like RACES, ARES, Skywarn, REACT and SATERN) directly supporting recognized governmental and non-governmental emergency response efforts and occasional exercises shall have priority on the use of a frequency in the Amateur Radio Service. Amateurs not directly participating in such activities shall refrain from operation near such activities to avoid interference to emergency communication activities and occasional exercises."

While most amateur radio operators already recognize the importance of such operations and graciously yield frequencies to them, having such a formal requirement specifically mentioned in the rules will eliminate any vagueness and allow the Amateur Radio Service to better fulfill its emergency communications mission in a manner that best serves disaster relief agencies and the public.

In addition, volunteer organizations such as the ARRL could serve as a clearinghouse for notification of bulletins concerning such activities much as they have in the past for the FCC declarations of the communications emergencies, thus ensuring that non-participating Amateurs know what frequencies to avoid during an emergency.

Finally, I would also suggest that while you are revising section 97.113 ( c ) to authorize retransmission of ISS communications, you should also add the phrase "emergency alerting" between "propagation" and "and weather forecast" . Since the Federal Governments NOAA Weather Radio system now is used to also alert the general public about non-weather related emergencies, adding that phrase will allow amateur operators who wish to do so to retransmit government emergency alerting bulletins as well. It should be noted that most amateur radio equipment is now made by foreign manufacturers and is incapable of receiving SAME encoded bulletins from the NWS. Allowing the retransmission of those rare but important emergency alerts will allow those bulletins to reach Amateur Radio operators who might not be monitoring commercial outlets at the same time.

Thank you for your consideration.

Sincerely,

Gary Wilson, K2GW  
Section Emergency Coordinator  
Southern New Jersey Section  
American Radio Relay League